

## Additional information

A list of consulting firms to assist in the design of proper asbestos removal operations, asbestos abatement contractors having the equipment and expertise to properly remove, document, transport and dispose of the asbestos-containing wastes and approved landfills for the disposal of asbestos-containing waste materials can be found on the agency Web site at: [www.azdeq.gov/environ/air/asbestos/index.html](http://www.azdeq.gov/environ/air/asbestos/index.html) click on "Asbestos Contact Directory"



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### DISCLAIMER

The information presented here is merely a guidance and does not cover all of the asbestos NESHAP requirements. For further details, contact ADEQ's Asbestos NESHAP Program Coordinator at (602) 771-2333.

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# WHAT SMALL COMMUNITIES NEED TO KNOW ABOUT ASBESTOS DEMOLITION AND RENOVATION PRACTICES



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*The purpose of this document is to outline the environmental requirements for facility demolitions and renovations. Most structures which small communities demolish or renovate are subject to federal regulations concerning asbestos, specifically the National Emissions Standards for Hazardous Air Pollutants (NESHAP) found in Title 40 Code of Federal Regulations (CFR) Part 61, Subpart M, Asbestos-NESHAP.*

*In Arizona, the Arizona Department of Environmental Quality (ADEQ), in close coordination with the U.S. Environmental Protection Agency, administers the federal and state asbestos programs. These federal regulations have been adopted as Title 18 Chapter 2 Section 1101 (A)(8) of the Arizona Administrative Code (AAC).*

## Why is Asbestos Regulated?

Asbestos is a known human carcinogen and Asbestos-Containing Materials (ACM), if handled improperly during disturbance, can release asbestos fibers that can become airborne, can remain suspended almost indefinitely and can travel great distances from their point of disturbance. The Asbestos-NESHAP regulations are intended to help protect public health and the environment by minimizing the release of asbestos fibers into the air as a result of the processes that occur during the handling of ACM from their initial disturbance to their proper disposal as asbestos-containing waste.

## What Types of Facilities and Activities are Regulated?

Facility (normally a building) renovations are subject to asbestos NESHAP if threshold amounts of regulated asbestos-containing materials (RACM) are disturbed. Threshold amounts of RACM are:

- 260 linear feet (measurement for material on pipes)
- 160 square feet (measurement for material on surface area)
- 35 cubic feet (measurement for material off facility components; i.e. waste)



**NOTE:** The Occupational Safety and Health Administration (OSHA) regulates asbestos in the work place. Therefore, small communities should also be aware of, and adhere to, OSHA requirements (in addition to NESHAP requirements) for the safety of the work force and unprotected third parties potentially exposed to asbestos during demolition and renovation activities.

## Are There Any Common Exemptions to the Facilities Rules?

Yes. A single, residential building with four or fewer dwelling units may be exempt from Asbestos NESHAP requirements, if the building has never been used for commercial purposes, and the renovation or demolition activities are not part of a larger project (i.e. additional renovations or demolitions). It is recommended that your community contact ADEQ to verify whether a residential building qualifies for this exemption.

Even if your facility is an exempt project, ADEQ encourages the use of proper procedures for inspections, approved work practices for asbestos removal that include the use of proper personal protective equipment, and proper disposal of asbestos-containing waste. Also, OSHA requirements may still apply to a NESHAP-exempt project.

## What Are the Steps for NESHAP Compliance?

A thorough inspection (asbestos survey) must first be completed to identify and quantify ACM in a structure. This means an inspection during which all suspect asbestos-containing materials are identified and the materials are assumed to contain asbestos or must be sampled and analyzed by an approved laboratory to determine their asbestos content. In either case the agency recommends that an Asbestos Hazard Emergency Response Act (AHERA) trained and certified building inspector complete inspections. A list of consulting firms having individuals with this certification, and approved laboratories for testing suspect asbestos containing materials can be found on the agency Web site at: [www.azdeq.gov/envirom/air/asbestos/index.html](http://www.azdeq.gov/envirom/air/asbestos/index.html) click on "Asbestos Contact Directory"

If asbestos is found above threshold amounts, it must be properly removed, managed and disposed, prior to disturbance of the surrounding materials. Notification to ADEQ is required prior to this abatement work beginning.

If asbestos is not found, or is determined to not exceed threshold amounts, renovation projects may continue without further NESHAP requirements. However, demolition projects regardless of asbestos content require notification to ADEQ, prior to the demolition work beginning.

## How Are the Notification Requirements Conducted?

Asbestos Notification for Renovation and Demolition Activities for all Arizona counties and Tribal Lands can be found on the agency Web site at [www.azdeq.gov/envirom/air/asbestos/index.html](http://www.azdeq.gov/envirom/air/asbestos/index.html). Click on the appropriate county. All notifications are required to be postmarked 10 working days prior to the disturbance of asbestos or beginning of the demolition, with the date of the postmark counting as day zero in the notification process.

## What Are the Proper Asbestos Abatement and Management Procedures?

OSHA in 29 CFR 1926.1101 specifies the use of: regulated areas, HEPA vacuums, wet methods, prompt cleanup and disposal, use of leak-tight containers, containment and local exhaust systems equipped with HEPA filtration. These techniques have proven effective in addressing the management of airborne asbestos fibers and asbestos-containing waste materials during the abatement of RACM in facilities to be demolished or renovated.



## Never Burn Asbestos-Containing Materials

It is illegal to release asbestos fibers into the air. Please refer to ADEQ's brochure entitled, "What Small Communities and Firefighters Need to Know About Asbestos in Buildings" ([www.azdeq.gov/function/compliance/download/ecos\\_asb.pdf](http://www.azdeq.gov/function/compliance/download/ecos_asb.pdf)) for information on fire training burns.